

MOUND, COTTON, WOLLAN & GREENGRASS

COUNSELLORS AT LAW

ONE BATTERY PARK PLAZA
NEW YORK, NY 10004-1486

(212) 804-4200

FAX: (212) 344-8066

WWW.MOUNDCOTTON.COM

LAWRENCE S. GREENGRASS

(212) 804-4237

LGREENGRASS@MOUNDCOTTON.COM

ONE RIVERFRONT PLAZA
NEWARK, NJ 07102-8497
(973) 242-2080

1700 CALIFORNIA STREET
SAN FRANCISCO, CA 94115
(415) 434-4301

LONGBOW HOUSE
14-20 CHISWELL STREET
LONDON EC1Y 4TY
(207) 638-3688

April 9, 2003

Via Federal Express

The Honorable William D. Quarles, Jr.
U.S. District Court for the District of Maryland
101 West Lombard Street
Baltimore, MD 21201

Re St. Paul Fire and Marine Insurance Company v. Transamerica
Occidental Life Insurance Company, et al.
U.S. District Court of the District of Maryland; No.: WDO2CV3123

Dear Judge Quarles:

We write to request the Court's assistance with a matter of judicial administration. As the Court is aware, we represent all but two of the defendants in the above referenced action and our clients (hereafter the "Moving Defendants") have made a motion to stay the above referenced proceeding. The basis of the Moving Defendants' request for a stay is set forth in detail in the motion papers that have been submitted to the Court. St. Paul Fire and Marine Insurance Company ("St. Paul") requested and obtained the Moving Defendants' permission for a brief extension of time to respond to the motion for a stay. Now, prior to responding to the motion to stay this proceeding, St. Paul has filed a motion for partial summary judgment in this matter.

If this Court were inclined to grant the stay of this proceeding as requested by the Moving Defendants, it would obviate the need for the Court and the Moving Defendants to expend their time and resources addressing St. Paul's motion at this juncture. Thus, we respectfully submit that for reasons of judicial economy this Court should hold St. Paul's motion in abeyance until a ruling is issued on the pending motion for a stay and that the Moving Defendants' time to respond to St. Paul's motion be tolled until the motion for a stay has been ruled upon. Should the Court wish to schedule a conference to discuss this matter further, we would be happy to attend.

MOUND, COTTON, WOLLAN & GREENGRASS

The Honorable William D. Quarles, Jr.
April 9, 2003
Page 2

Thank you for your consideration in this matter.

Very truly yours,


Lawrence S. Greengrass

LSG:rfk

cc: Paul F. Strain, Esq.
James A. Dunbar, Esq.
Gregg L. Bernstein, Esq.
Reid A. Evers, Esq.
Bryan Bolton, Esq.
Lisa Bondurant, Esq.
J. Snowden Stanley, Esq.
(via Federal Express)

*Submission of pro hac vice admission application pending.